

1 Marek P. Bute
Nevada Bar No. 9989
2 SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway
3 Suite 1100
Las Vegas, Nevada 89169
4 Telephone: 702.784.5200
Facsimile: 702.784.5252
5 Email: mbute@swlaw.com

6 Becca J. Wahlquist (*pro hac vice* pending)
SNELL & WILMER L.L.P.
7 350 South Grand Ave #2600
Los Angeles, CA 90071-3406
8 Tel: (213) 929-2544
Email: mbute@swlaw.com
9

10 *Attorneys for Defendant Credit One Bank, N.A.*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 JUAN MORENO, individually and on behalf
of all
14 others similarly situated,,

15 Plaintiff,

16 vs.

17 CREDIT ONE BANK, N.A.,

18 Defendant.
19

Case No. 2:15-CV-02135-GMN-PAL

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE ANSWER TO
CLASS ACTION COMPLAINT**

(FIRST REQUEST)

20 Defendant Credit One Bank, N.A (“Credit One”), by and through its counsel at the law
21 firm of Snell & Wilmer L.L.P., and Plaintiff Juan Moreno (“Plaintiff”), by and through his
22 counsel at the law firms of Shook & Stone, Chtd. and Grant & Eisenhofer, P.A., hereby stipulate
23 as follows:

24 WHEREAS, Credit One was served with the Complaint and Summons in this action on
25 December 9, 2015, making its response due on December 31, 2015;

26 WHEREAS, Credit One needs time to investigate the Complaint’s allegations and confer
27 with Plaintiff’s counsel, and has only recently retained counsel to represent it in this action;
28

WHEREAS, the Parties agree that this Stipulation is not made for the purposes of delay, and Plaintiff has agreed to Credit One's request that it be given an additional thirty (30) days to respond to the Complaint, through February 1, 2016;

THEREFORE, the Parties hereby agree that Credit One shall have until February 1, 2016 to file a responsive pleading to Plaintiff's Complaint, and that any such pleading filed by that date shall be deemed timely.

By entering into this stipulation, Credit One does not waive any of its defenses or objections to the lawsuit, except that Credit One waives any objections to service of process of the Complaint.

Dated this 23rd day of December, 2015.

Dated this 23rd day of December, 2015.

SNELL & WILMER L.L.P.

SHOOK & STONE, CHTD.

By: /s/Marek P. Bute

By: /s/Leonard H. Stone

Marek P. Bute
Nevada Bar No. 9989
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169

Leonard H. Stone
Nevada Bar No. 5791
710 South Fourth Street
Las Vegas, Nevada 89101
Tel: (702) 385-2220

Becca J. Wahlquist (*pro hac vice* pending)
SNELL & WILMER L.L.P.
350 South Grand Ave #2600
Los Angeles, CA 90071-3406
Tel: (213) 929-2544

Adam J. Levitt (*pro hac vice* pending)
Diane Zilka (*pro hac vice* pending)
Kyle J. McGee (*pro hac vice* pending)
GRANT & EISENHOFER P.A.
30 North LaSalle Street, Suite 2350
Chicago, Illinois 60602
Tel: (312) 214-0000
Attorneys for Plaintiff

*Attorneys for Defendant
Credit One Bank, N.A.*

ORDER

IT IS SO ORDERED that Defendant Credit One Bank, N.A. shall have until February 1, 2016 to file a responsive pleading to Plaintiff's Class Action Complaint in the above-captioned matter.

DATED this 5 day of January 20116.


UNITED STATES DISTRICT JUDGE